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WASHINGTON, D.C. 20036

PAUL E. SULLIVAN*
CLETA DEATHERAGE MITCHELL
BOB DAHL
of Counsel

(202) 861-5900
(202) 861-6065 *facsimile*

**Admitted in California only*

June 8, 2000

Ms. Alva Smith
General Counsel's Office
Federal Election Commission
999 E Street, NW
Washington, DC 20463

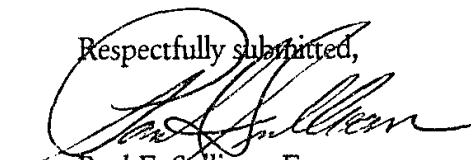
Re: *MUR 4954*
Supplemental Information

Dear Ms. Smith:

Enclosed please find a copy of a Complaint dated December 9, 1999 regarding the Ulster County Republican Committees' violation of the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act"). As requested by you and authorized by my client Forbes 2000, Inc., please also find supplemental materials regarding similar violations by the Rensselaer County Republican Committee that were relevant to your investigation in the above referenced matter.

Should you have any questions, please feel free to contact me at (202) 861-5900.

Respectfully submitted,


Paul E. Sullivan, Esq.
Counsel to Forbes 2000, Inc.

Enclosures

cc: William A. Dal Col, President
Forbes 2000, Inc.

JUN 13 10 09 AM '00

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL



RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

1999 DEC 13 A 9:43

December 9, 1999

Mr. Scott Thomas
Chairman
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Chairman:

Pursuant to 2 U.S.C. § 437g(a)(1), I am enclosing documents from the Ulster County Republican Committee that I believe constitutes a violation of the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act").

The materials request the recipient to assist the Bush for President Committee in obtaining signatures on petitions for the Bush for President delegates and alternates to the 2000 Republican National Convention. The petitions attached also list names of candidates for delegate and the alternates and indicate that all are supporting George Bush.

The delegate materials were sent out on Ulster County Republican Committee letterhead and signed by the County Committee's Chairman, Mr. Peter Savago. Please note also that the envelope in which it was sent has a return address of the Ulster County Republican Committee, P.O. Box 3413, Kingston, New York 12402 ("Delegate Materials").

The value of the printing and postage and the staff time of the Ulster County Republican Committee and/or its vendors and agents to prepare and mail the Delegate Materials constitutes an in-kind contribution to the Bush for President Committee, subject to the limits and prohibitions of the FECA.

The solicitation of signatures for delegate and alternate petitions clearly comes within the definition of an "election" as found in the FECA (2 U.S.C. § 431(1)(B) and (C)).

The funds expended and the value of goods and services spent to influence this election of George Bush for President constitutes a contribution to that committee (2 U.S.C. § 431(8)(A)(i) and (ii)).

The entire value of the printing, postage, and the value of the staff, equipment and facilities of the Ulster County Republican Committee or its agents or vendors, constitutes a contribution to the Bush for President Committee. It is subject to the contribution limits, specifically One Thousand Dollars (\$1,000.00) (2 U.S.C. § 441(a)).

In addition, since the campaign finance statutes for the State of New York permit corporate treasury funds to be contributed to state and county political committees, it is probable that all or a portion of the in-kind contribution referenced above was paid for from corporate or otherwise prohibited and excessive funds in the Ulster County Republican Committee (2 U.S.C. § 431(8)(A)(i) and § 431(a)(C)).

Mr. Scott Thomas
Chairman
Federal Election Commission
December 9, 1999
Page 2

In addition, the Delegate Materials fail to include a notice as to who paid for those materials and the postage. This constitutes a violation of 2 U.S.C. § 431(d).

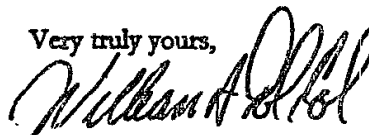
I would request that the Commission undertake a finding of reason to believe that a violation of the FECA has occurred and conduct and appropriate investigation. Such an investigation should also inquire of the Bush for President Committee as to whether other state or county party organizations in that have expended funds in New York or any other state in support of similar efforts for delegates and alternates for George W. Bush to the Republican National Convention.

In addition, it is apparent that the resources of the Ulster County Republican Committee are being utilized for the delegate and alternate selection process. It is also likely that the resources and staff of the county committee are being used in other fashions to benefit and to influence the election of George W. Bush. The scope of the Commission's investigation should include and inquire of the county committee as to whether other party resources are being used to influence the election of George W. Bush.

In light of the immediate and irreparable injury to the candidacy of Steve Forbes, as well as other Republican presidential candidates opposing Mr. Bush, I would request that immediate action be taken by the Commission to investigate this matter and direct the Ulster County Republican Committee and other state and county committees to cease and desist from these violations of the FECA.

Upon completion of the Commission's investigation, I would request that appropriate remedies be undertaken in accordance with the FECA.

Very truly yours,

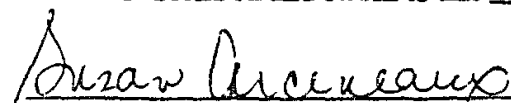


William A. Dai Col
President
Forbes 2000, Inc.

COUNTY OF FAIRFAX :

COMMONWEALTH OF VIRGINIA :

Subscribed and sworn to this 10th day of December, 1999.


Susan Arceneaux, Notary Public

My Commission Expires:

My Commission Expires
June 30, 2003



Ulster County Republican Committee



Peter J. Savago, Chairman

TO: ALL REPUBLICAN COUNTY COMMITTEEMEN

FROM: PETER J. SAVAGO
CHAIRMAN, ULSTER COUNTY REPUBLICAN COMMITTEE

DATE: December 1, 1999

RE: PETITION FOR DELEGATES & ALTERNATES TO THE 2000 PRESIDENTIAL
CONVENTION AND DESIGNATING PETITION OF GEORGE W. BUSH FOR
PRESIDENT.

1. Petitions can be signed immediately.
2. PLEASE RETURN PETITIONS BY DECEMBER 29th, 1999.

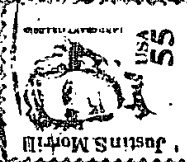
I realize that this will present a hardship due to the holidays, but it is imperative that they are returned to REPUBLICAN HEADQUARTERS NO LATER THAN DECEMBER 29TH, 1999.

Thank you for your cooperation.

Peter J. Savago, Chairman
Ulster County Republican Committee

***** - ALL ULSTER COUNTY TOWNS AND THE CITY OF KINGSTON
ARE IN THE 26th Congressional District

20.04.402 2472



Designating Petition Sec. 6-132, ELECTION LAW

I, the undersigned, do hereby state that I am a duly enrolled voter of the Republican Party and entitled to vote at the next primary election of such party, to be held on March 7, 2000; that my place of residence is truly stated opposite my signature hereto, and I do hereby designate the following named person (or persons) as a candidate (or candidates) for the nomination of such party for public office or for election to a party position of such party.

Name of Candidate(s)	Public Office or Party Position	Place of Residence (also Post Office address, if not identical)
1. Thomas W. Libous	Delegates to the 2000	346 Conklin Avenue, Binghamton, NY 13903
2. Joseph A. Laughney	Republican National Convention	403 Groats Avenue, Endicott, NY 13760
3. Peter J. Savago	From the 26th Congressional District	101 DuBois Road, New Paltz, NY 12561
<hr/>		
1. Wallis A. Kraham	Alternate Delegates to the 2000	1215 Chenango Street, Binghamton, NY 13901
2. John H. Dippel	Republican National Convention	121 Hasbrouck Road, New Paltz, NY 12561
3. Ronald Dougherty	From the 26th Congressional District	26 Ross Street, P.O. Box 7, Owego, NY 13827
	All Supporting George W. Bush	

I do hereby appoint William D. Powers, 311 County Route 13, Old Chatham, NY 12136; George E. Pataki, Ienia, Route 9D, Garrison, NY 10524; Joseph L. Bruno, 89 Bulson Road, Troy, NY 12180; Mary O. Donohue, 102 Brunswick Road, Troy, NY 12180; Joseph N. Mondello, 12 Shotgun Lane, Levittown, NY 11756; John J. Faso, 14 Sylvester Street, P.O. Box 474, Kinderhook, NY 12106; Lisa L. Ruggles, 1611 Route 9, Stuyvesant, NY 12173; Joseph Brendan Quinn, 32 Cobble Hill Drive, Gansevoort, NY 12831; Mary F. Obwald, 6244 Empire Avenue, Schenectady, NY 12306; Jeffrey T. Buley, 6 Whitestone Way, Slingerlands, NY 12159; Thomas F. Doherty, Jr., 206 Alpine Place, Town of Eastchester (P.O. Tuckahoe), NY 10707 as a committee to fill vacancies in accordance with the provisions of the election law.

In witness whereof, I have hereunto set my hand, the day and year placed opposite my signature.

Date	Name of signer (signature required) (printed name may be added)	Residence	Enter Town or City except in NYC enter County
1. / / 1999	Printed Name		
2. / / 1999	Printed Name		
3. / / 1999	Printed Name		
4. / / 1999	Printed Name		
5. / / 1999	Printed Name		
6. / / 1999	Printed Name		
7. / / 1999	Printed Name		
8. / / 1999	Printed Name		
9. / / 1999	Printed Name		
10. / / 1999	Printed Name		

Complete ONE of the following

1) STATEMENT OF WITNESS

I, (name of witness) _____, state: I am a duly qualified voter of the State of New York and am an enrolled voter of the Republican Party.

I now reside at. (residence address) _____

Each of the individuals whose names are subscribed to this petition sheet containing (fill in number) _____ signatures, subscribed the same in my presence on the dates above indicated and identified himself to be the individual who signed this sheet.

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Name of Candidate(s)	Public Office or Party Position	Place of Residence (also Post Office address, if not identical)
George W. Bush	President of the United States of America	1010 Colorado Austin, Texas 78701

I do hereby appoint William D. Powers, 311 County Route 13, Old Chatham, NY 12136; George E. Pataki, Ienia, Route 9D, Garrison, NY 10524; Joseph L. Bruno, 89 Bulson Road, Troy, NY 12180; Mary O. Donohue, 102 Brunswick Road, Troy, NY 12180; Joseph N. Mondello, 12 Shotgun Lane, Levittown, NY 11756; John J. Faso, 14 Sylvester Street, P.O. Box 474, Kinderhook, NY 12106; Lisa L. Ruggles, 1611 Route 9, Stuyvesant, NY 12173; Joseph Brendan Quinn, 32 Cobble Hill Drive, Gansevoort, NY 12831; Mary F. Obwald, 6244 Empire Avenue, Schenectady, NY 12306; Jeffrey T. Buley, 6 Whitestone Way, Slingerlands, NY 12159; Thomas F. Doherty, Jr., 206 Alpine Place, Town of Eastchester (P.O. Tuckahoe), NY 10707 as a committee to fill vacancies in accordance with the provisions of the election law.

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9. / / 1999	Printed Name		
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Complete ONE of the following

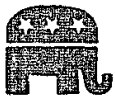
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I understand that this statement will be accepted for all purposes as the equivalent of an affidavit and if it contains a material false



**Rensselaer
County
Republican
Committee**

JAMES A. WALSH, Chairman

MEMORANDUM

TO: City and Town Chair people, District Leaders
FROM: James A. Walsh, Chairman, Rensselaer County Republican Committee
SUBJECT: Bush Presidential petitions
DATE: December 1, 1999

As we approach the year 2000, we must begin preparing for the upcoming Presidential election. The first step in this process is the circulation of petitions. Headquarters has both George W. Bush petitions and convention delegate petitions. I am asking that you please distribute these to your committee people to be circulated and signed. The petitions will be due back December 21. Petition packets will be available to you or your representative at our open house, next Tuesday, December 7. If you or a designee can not be there on that date, it is imperative that you contact Lev Ginsburg at 272-2111 to make other arrangements. This is a very important undertaking at what I understand is a very difficult time of year. Your cooperation is very much appreciated.

Yours truly,

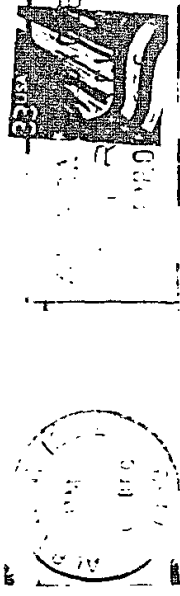
James A. Walsh

R Rensselaer County
Republican Committee
P.O. Box 686
Troy, NY 12181-0686

[REDACTED]

12182+3726

12182+3726



Designating Petition Sec. 6-132, ELECTION LAW

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Name of Candidate(s)	Public Office or Party Position	Place of Residence (also Post Office address, if not identical)
1. John E. Sweeney	Delegates to the 2000 Republican National Convention From the 22nd Congressional District All Supporting George W. Bush	1502 Lookout Lane, Clifton Park, NY 12065
2. Joseph L. Bruno		89 Bulson Road, Troy, NY 12180
3. Mary O. Donohue		102 Brunswick Road, Troy, NY 12180
1. Kathleen A. Marchione	Alternate Delegates to the 2000 Republican National Convention From the 22nd Congressional District All Supporting George W. Bush	9 Breski Lane, Halfmoon, NY 12065
2. John Faso		P.O. Box 474, 14 Sylvester Street, Kinderhook, NY 12106
3. Mary Ann Kordich		36 North Jefferson Avenue, Apt. 1, Catskill, NY 12414

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Name of Candidate(s)	Public Office or Party Position	Place of Residence (also Post Office address, if not identical)
George W. Bush	President of the United States of America	1010 Colorado Austin, Texas 78701

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I understand that this statement will be accepted for all purposes as the equivalent of an affidavit and, if it contains a material false statement, shall subject me to the same penalties as if I had been duly sworn.